



Telecom Notice of Consultation CRTC 2011-220

PDF version

Route reference: Telecom Decision 2011-69, as amended

Ottawa, 29 March 2011

Call for comments

Review of the regulatory measures associated with the provision of maps by incumbent and competitive local exchange carriers

File number: 8663-C12-201105586

Introduction

1. In Telecom Decision 2011-69, the Commission issued an updated action plan to review certain regulatory measures in light of the Governor in Council's *Order Issuing a Direction to the CRTC on Implementing the Canadian Telecommunications Policy Objectives*, P.C. 2006-1534, 14 December 2006 (the Policy Direction).
2. The Policy Direction requires, among other things, that the Commission rely on market forces to the maximum extent feasible and regulate where there is still a need to do so, in a manner that interferes with market forces to the minimum extent necessary to meet the telecommunications policy objectives (policy objectives) set out in section 7 of the *Telecommunications Act*. The Policy Direction also requires that the Commission, when relying on regulatory measures, specify the policy objective that is advanced by those measures. With respect to regulatory measures that are of a social or non-economic measure, the Policy Direction requires that the Commission should, to the greatest extent possible, implement measures in a symmetrical and competitively neutral manner.
3. As part of the updated action plan, the Commission identified the following as matters to be reviewed: 1) the requirement for a competitive local exchange carrier (CLEC) to file serving area maps, and 2) the provision of digital maps of exchanges by incumbent local exchange carriers (ILECs) to CLECs.

Background

4. An exchange is a basic unit for the administration and furnishing of telephone service, and normally includes a city, town, or village, and adjacent parts. The territory served by an exchange, within which local service rates apply, is known as the exchange area or local service area. In some cases a local service area includes two or more exchanges. Exchange area information is used for, among other things, determining local calling areas.

5. For the purposes of interconnection, exchanges are consolidated into larger local interconnection regions (LIRs) to establish a single point of interconnection for all CLECs operating in the LIR.
6. In Telecom Decision 97-8, the Commission noted that serving area maps were necessary for, among other things, the provisioning of central office codes.¹ Accordingly, the Commission, as a condition of offering service, required CLECs to provide to the Commission serving area maps and make such serving area maps available upon request at their business offices.
7. In Telecom Decision 2006-58, the Commission considered that, for the purpose of interconnecting with a small CLEC, it was important that other local exchange carriers have a clear understanding of the small CLEC's serving area. Accordingly, the Commission required small CLECs to make their serving area maps available upon request.
8. In various decisions, the Commission stated that the ILECs should be prepared to provide certain network information, including maps of their exchange area boundaries, which may be requested by other service providers. For example, in Decision 2001-238, the Commission stated that the ILECs should be prepared to furnish mapping information for all bands and all exchanges/wire centres in electronic format, upon request.

Issue

9. The Commission notes that ILECs and CLECs currently have different requirements for the provision of maps. The Commission also notes that in the proceeding that led to Telecom Decision 2011-69, the parties had different views on the provision of maps. Specifically, some parties questioned the purpose of the requirements to provide maps, while other parties expressed concerns about the delays and the different charges that are applied when maps are requested. In light of the above, the Commission considers that the requirements for CLECs and ILECs to provide maps should be reviewed.

Call for comments

10. The Commission invites parties to comment, in light of the Policy Direction, on the appropriateness of requiring 1) CLECs to provide serving area maps, and 2) the ILECs to provide maps of their exchanges and LIRs. The Commission also invites comments on whether there should be standard time frames and charges for the provision of ILECs' maps.

¹ A central office code, or NXX, is the first three digits following the area code in a 10-digit telephone number (123-NXX-4567), where X can be any number between 0 and 9 and N can be any number between 2 and 9.

11. Parties should address the following issues in their initial comments, providing supporting rationale and all evidence on which they rely, and structure their submissions according to the issues identified below:
 - 1) Can the purpose underlying the regulatory measure be achieved through reliance on market forces or is the regulatory measure still necessary?
 - a) Identify the purpose of the regulatory measure and the policy objectives that are relevant to this purpose.
 - b) Can market forces be relied on to achieve the policy objectives? Why or why not? Identify the relevant market forces.
 - c) Identify and weigh the positive and the negative consequences of (i) eliminating, and (ii) retaining, the regulatory measure.
 - 2) Is the regulatory measure efficient and proportionate to its purpose?
 - a) Identify any benefits or harmful effects of the regulatory measure. Explain whether the benefits of the regulatory measure outweigh the harmful effects.
 - b) Identify any alternative regulatory measure that could be more efficient and proportionate. Explain why the alternative measure would be more efficient and proportionate and how it would meet the policy objectives.
 - 3) Does the regulatory measure interfere with the operation of competitive market forces to the minimum extent necessary to meet the policy objectives? If not, how and to what extent does the current regulatory measure interfere with the operation of competitive market forces, including the associated impacts on telecommunications service providers (TSPs) and customers?
 - 4) Is the regulatory measure implemented in a symmetrical and competitively neutral manner? If not,
 - a) identify aspects of the regulatory measure that are not symmetrical and/or competitively neutral;
 - b) specify the disadvantages faced by TSPs impacted by the regulatory measure and quantify the disadvantages to the extent possible;
 - c) discuss the implications and feasibility of applying the regulatory measure in a symmetrical and competitively neutral manner to all TSPs as appropriate; and
 - d) identify any possible alternative regulatory or non-regulatory measure and explain how that measure would meet the policy objectives and comply with the Policy Direction.
12. The Commission notes that the outcome of this proceeding may result in changes to the obligations of all TSPs regarding the provision of maps.

Procedure

13. Parties interested in participating in this proceeding and receiving copies of all submissions must notify the Commission of their intention to do so by filling out the online form or by writing to the Secretary General (by mail: CRTC, Ottawa, Ontario, K1A 0N2; by fax: 819-994-0218) by **10 May 2011** (the registration date). Parties are to provide their email addresses, where available. If parties do not have access to the Internet, they are to indicate when they notify the Commission whether they wish to receive disk versions of hard-copy filings.
14. As soon as possible after the registration date, the Commission will post on its website a complete list of interested parties, their mailing addresses, and, if available, their email addresses, identifying those parties who wish to receive disk versions.
15. Any person who wishes merely to file written comments in this proceeding, without receiving copies of the various submissions, may do so by writing to the Commission by **20 June 2011** at the address or fax number noted above, or by using the following comments link.
16. All parties may file comments with the Commission regarding the above-noted issues, serving copies on all other parties, by **30 May 2011**.
17. All parties may file reply comments with the Commission, serving copies on all other parties, by **20 June 2011**.
18. The Commission expects to publish a decision on the issues raised in this notice within four months of the close of record.
19. The Commission will not formally acknowledge comments. It will, however, fully consider all comments, which will form part of the public record of the proceeding.
20. If a document is to be filed or served by a specific date, the document must be actually received, not merely sent, by that date.
21. Parties may file their submissions electronically or on paper. Submissions longer than five pages should include a summary.
22. Electronic submissions should be in HTML format. Alternatively, Microsoft Word may be used for text and Microsoft Excel for spreadsheets.
23. Each paragraph of all submissions should be numbered. In addition, the line *****End of document***** should follow the last paragraph. This will help the Commission verify that the document has not been damaged during electronic transmission.
24. The Commission also encourages parties to monitor the record of this proceeding and/or the Commission's website for additional information that they may find useful when preparing their submissions.

Important notice

25. Note that all information that parties provide as part of this public process, except information granted confidentiality, whether sent by postal mail, facsimile, email, or through the Commission's website at www.crtc.gc.ca, becomes part of a publicly accessible file and will be posted on the Commission's website. This includes personal information, such as full names, email addresses, postal/street addresses, telephone and facsimile numbers, and any other personal information parties provide.
26. The personal information that parties provide will be used and may be disclosed for the purpose for which the information was obtained or compiled by the Commission, or for a use consistent with that purpose.
27. Documents received electronically or otherwise will be posted on the Commission's website in their entirety exactly as received, including any personal information contained therein, in the official language and format in which they are received. Documents not received electronically will be made available in PDF format.
28. Please note that the information that parties provide to the Commission as part of this public process is entered into an unsearchable database dedicated to this specific public process. This database is accessible only from the web page of this particular public process. As a result, a general search of the Commission's website with the help of either its search engine or a third-party search engine will not link directly to the information that was provided as part of this public process.

Location of CRTC offices

29. Submissions may be examined or will be made available promptly upon request at the Commission offices during normal business hours.

Toll-free telephone: 1-877-249-2782

Toll-free TDD: 1-877-909-2782

Central Building
Les Terrasses de la Chaudière
1 Promenade du Portage, Room 206
Gatineau, Quebec J8X 4B1
Tel.: 819-997-2429
Fax: 819-994-0218

Regional offices

Metropolitan Place
99 Wyse Road, Suite 1410
Dartmouth, Nova Scotia B3A 4S5
Tel.: 902-426-7997
Fax: 902-426-2721

205 Viger Avenue West, Suite 504
Montréal, Quebec H2Z 1G2
Tel.: 514-283-6607

55 St. Clair Avenue East, Suite 624
Toronto, Ontario M4T 1M2
Tel.: 416-952-9096

Kensington Building
275 Portage Avenue, Suite 1810
Winnipeg, Manitoba R3B 2B3
Tel.: 204-983-6306
Fax: 204-983-6317

2220 – 12th Avenue, Suite 620
Regina, Saskatchewan S4P 0M8
Tel.: 306-780-3422

10405 Jasper Avenue, Suite 520
Edmonton, Alberta T5J 3N4
Tel.: 780-495-3224

858 Beatty Street, Suite 290
Vancouver, British Columbia V6B 1C1
Tel.: 604-666-2111
Fax: 604-666-8322

Secretary General

Related documents

- *Updated action plan for reviewing regulatory measures*, Telecom Decision CRTC 2011-69, 4 February 2011, as amended by Telecom Decision CRTC 2011-69-1, 21 February 2011
- *Canadian Cable Telecommunications Association - Part VII application regarding the application of some competitive local exchange carrier (CLEC) obligations to certain CLECs*, Telecom Decision CRTC 2006-58, 18 September 2006
- *Restructured bands, revised loop rates and related issues*, Decision CRTC 2001-238, 27 April 2001, as amended by Decision CRTC 2001-238-1, 28 May 2001, and Decision CRTC 2001-238-2, 7 August 2001
- *Local competition*, Telecom Decision CRTC 97-8, 1 May 1997